

9 MATT GAFFNEY: Good evening. My name is
10 Matt Gaffney, project coordinator for Inyo County
11 Yucca Mountain repository assessment office. These
12 are preliminary comments prepared by staff. The
13 county is still in the process of assessing all three
14 EISSs. The Inyo County Board of Supervisors will
15 submit written comments to the Department of Energy
16 no later than January 10, 2008 that represent Inyo
17 County's final comments for the administrative
18 record.

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19 [From Inyo County's perspective, the most
20 glaring omission in the draft repository SEIS is that
21 it contains no meaningful assessment of potential
22 impacts to the lower carbonate aquifer. The draft
23 repository SEIS makes no predictions based on water
24 infiltration rates and waste package corrosion rates,
25 as well as groundwater migration times, of the
1 severity or time frame for impacts to the lower
2 carbonate aquifer or discharge point into Death
3 Valley National Park.

4 Accordingly, the draft SEIS contains no
5 impact assessment whatsoever for plant life,
6 wildlife, wildlife habitat or drinking supplies in
7 the park that could be potentially impacted by
8 migrating radionuclides from the repository. The DOE
9 concedes that Death Valley proper is the regional and
10 hydrology sink for surface and groundwater in the
11 region, yet Inyo County is scarcely mentioned in

12 terms of groundwater impacts from the repository.

13 The Yucca Mountain regional hydrographic map
14 on page 333, figure 3.9 in the affected environment
15 section, omits California in terms of hydrographic
16 areas, even though maps on preceding pages clearly
17 show Inyo County and Death Valley as part of the
18 Death Valley regional groundwater flow system
19 receiving flow from both the volcanic aquifers and
20 lower carbon aquifers.

21 There's one paragraph in the draft
22 repository SEIS that summarizes in very general terms
23 the county's groundwater studies program. There's no
24 assessment or validation of the county's program, and
25 the draft repository SEIS incorporated none of the
1 county's fuel chemical analysis which strongly
2 suggests the connection between water underneath the
3 repository and seeps into springs in Death Valley
4 National Park.

5 Additionally, there is an upper gradient
6 that exists in the lower carbonate aquifer which
7 causes lower carbonate aquifer water to move upward
8 into the volcanic aquifers because of a steep down
9 gradient found in the vicinity of Yucca Mountain.
10 The DOE argues that this upper gradient will prevent
11 migration of radionuclides from the repository to the
12 carbon aquifer.

13 While Inyo County's scientific data supports
14 this conclusion, the upper gradient is a very fragile
15 hydrologic condition. The county believes that the

16 upper gradient could be degraded by regional ground
17 water pumping both from the carbonate and volcanic
18 aquifers.

19 The DOE maintains the future affects of the
20 groundwater pumping are highly speculative and need
21 not be considered in any NEPA analysis; therefore,
22 there is no analysis from groundwater pumping in the
23 region and no regulatory measures to maintain the
24 upper gradient.

25 Inyo County strongly disagrees with this
1 assertion, and at the very least the county believes
2 the Department of Energy should consider present
3 pumping rates and their impact on the upper gradient
4 and radionuclide migration from the repository. Any
5 NEPA analysis of repository performance and
6 radionuclide migration that does not take into
7 account the effects of groundwater pumping is
8 incomplete and completely inadequate.]

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9 [There's also no final EPA standard regarding
10 acceptable radiation releases from the repository.
11 Without this sole compliance standard for the
12 repository in the NEPA analysis, it is impossible for
13 oversight entities, such as Inyo County, to evaluate
14 the future performance of the repository.]

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15 [There is no socioeconomic impact analysis to
16 southeast Inyo County or Death Valley National Park.
17 Inyo County again strongly disagrees with this
18 assertion. Inyo County is considered outside the

19 region of influence for NEPA analysis, although it is
20 only 20 miles away from the repository site.]

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21 [There is currently no rail line to Yucca
22 Mountain, which is the preferred method of
23 transportation for the Department of Energy. The
24 Caliente rail corridor faces numerous engineering
25 challenges, enormous costs and land use conflicts.

1 Inyo County believes there should be an assessment of
2 a mostly truck shipping campaign, which appears to be
3 a reasonable alternative under NEPA, and would highly
4 impact Inyo County.]

5

5 [There will be no certification of the
6 transportation aging and disposal canister, the
7 primary shipping and disposal canister for the
8 repository, before submission of the license
9 application to the Nuclear Regulatory Commission.

10 All four California commercial reactor sites
11 may have specific problems with the proposed TAD.
12 The DOE needs to fully examine radiation dose rates,
13 environmental impacts from the TAD system, and
14 contingency plans should the TAD not become a
15 reality. Also, cost arrangements of the TAD and how
16 the TAD will interface with the dry cask storage
17 system at reactor sites needs to be incorporated into
18 the final environmental impact statement.]

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19 And, finally, [the Timbisha Shoshone tribe
20 will be highly impacted from the Yucca Mountain
21 Project. The final EISs should assess and analyze
22 impacts to the tribe's drinking water supplies,

23 impacts from truck transport of the nuclear materials
24 through tribal lands, socioeconomic impacts, impacts
25 to cultural resources and environmental justice
1 issues.] Thank you.